

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IN RE LOANDEPOT, INC.  
DERIVATIVE LITIGATION

Lead Case No. 22-cv-320-CFC

**STIPULATION AND ~~PROPOSED~~ ORDER  
STAYING ACTION**

Plaintiffs Tuyet Vu and Jocelyn Porter (together, “Plaintiffs”); Defendants Anthony Hsieh, Patrick Flanagan, Nicole Carrillo, Andrew C. Dodson, John C. Dorman, Brian P. Golson, and Dawn Lepore (collectively, the “Individual Defendants”); and Nominal Defendant loanDepot, Inc. (“loanDepot,” and together with the Individual Defendants, “Defendants”) jointly submit this Stipulation to Stay Action (“Stipulation”), and in support thereof state as follows:

WHEREAS, on March 11, 2022 and March 25, 2022 Plaintiffs Tuyet Vu and Jocelyn Porter, respectively, filed verified derivative complaints in this Court;

WHEREAS, on April 5, 2022, the Court consolidated the derivative complaints for all purposes into the above-captioned stockholder derivative action (the “Stockholder Derivative Action”);

WHEREAS, on April 13, 2023, the Court granted the parties’ stipulated stay of the Stockholder Derivative Action pending the resolution of a summary judgment motion in the related class action pending in the United States District Court for the

Central District of California, captioned *Lako v. loanDepot, Inc., et al.*, Case No. 8:21-cv-01449;

WHEREAS, on October 7, 2024, after mediation, the parties reached a resolution in principle to settle this action, as well as the substantially similar derivative actions pending in the United States District Court for the Central District of California and the Delaware Court of Chancery (together with the Stockholder Derivative Action, the “Actions”), *see In re loanDepot, Inc. S’holder Deriv. Litig.*, Master File No. 2:21-cv-08173-JLS-JDE (C.D. Cal.); *In re loanDepot, Inc. Deriv. Litig.*, C.A. No. 2023-0613 (Del. Ch.);

WHEREAS, the parties to the Actions are in the process of memorializing this resolution in a comprehensive written settlement agreement (the “Agreement”);

WHEREAS, following the execution of the Agreement, the parties intend to file a motion for approval in the United States District Court for the Central District of California where the first of the Actions was filed and the underlying securities class action was pending and resolved; and

WHEREAS, the parties intend for the Agreement to cover all of the Actions;

IT IS HEREBY STIPULATED AND AGREED by the parties hereto, subject to the approval of the Court, that:

1. This Stockholder Derivative Action shall remain stayed;

2. Absent a request by the parties to lift the stay for good cause, the stay shall remain in effect until the approval of the Agreement; and

3. The Court will retain jurisdiction of the Stockholder Derivative Action pending Plaintiffs' dismissal thereof.

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Dated: October 17, 2024

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**IT IS SO ORDERED** this 24th day of October, 2024.

/s/ Colm F. Connolly  
The Honorable Colm F. Connolly